

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ENTROPIC COMMUNICATIONS, LLC,)	
)	
Plaintiff,)	Case No. 2:23-cv-00050-JRG
v.)	Case No. 2:23-cv-00051-JRG
)	
CHARTER COMMUNICATIONS, INC.,)	JURY TRIAL DEMANDED
)	
Defendant.)	
)	
)	

I, Krishnan Padmanabhan, declare as follows:

1. I am an attorney and am admitted pro hac vice to practice in the Eastern District of Texas Marshall Division. I am a partner with the law firm of Winston & Strawn LLP, which represents Defendant Charter Communications, Inc. (“Charter” or “Defendant”) in the above-captioned matter. I submit this declaration in support of **Defendant’s Motion to Deconsolidate This Action from No. 2:23-cv-00052-JRG, then Consolidate This Action with No. 2:23-cv-00050-JRG.** I know the facts set forth in this declaration to be true of my own personal knowledge, and if called as a witness, I could and would testify competently to the matters set forth herein.

2. On June 15, 2023, Charter and Entropic met and conferred on the lack of basis for consolidating the ’51 (MoCA) and ’52 (Cable) cases, and the need to break these cases apart and consolidate the ’50 (MoCA) and ’51 (MoCA) case for pretrial purposes.

3. During that meet and confer, counsel for Entropic acknowledged that it held back service of the ’51 (MoCA) so that it would be separated from the ’50 (MoCA) case. Counsel for Entropic also stated that they would not agree to deconsolidate the ’51 (MoCA) and ’52 (Cable) cases because they did not want to prejudice Entropic’s position that the ’50 (MoCA) and ’51

(MoCA) cases should remain separate, and similarly did not want to prejudice Entropic's position that the '125 (Cable) and '52 (Cable) cases should also remain separate.

Executed this 26th day of June, 2023.

Respectfully submitted,

/s/ Krishnan Padmanabhan
Krishnan Padmanabhan (*pro hac vice*)
kpadmanabhan@winston.com
WINSTON & STRAWN LLP
200 Park Ave.
New York City, NY 10166
Telephone: (212) 294-6700
Facsimile: (212) 294-4700

ATTORNEY FOR
CHARTER COMMUNICATIONS, INC.